

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GUARANTEED RATE, INC.,)
Plaintiff,) Case Number: 22 CV 2342
v.) Judge: Robert W. Gettleman
EIRIK RORVIG and NATIONS LENDING) Magistrate Judge: Jeannice W. Appenteng
CORPORATION,)
Defendants.)

JOINT STATUS REPORT

Plaintiff Guaranteed Rate, Inc. (“Plaintiff” or “GRI”), and Defendants Eirik Rorvig (“Rorvig”) and Nations Lending Corporation (“Nations”) (collectively, “Defendants”) (together with Plaintiff, the “Parties”), hereby state as follows for their Joint Status Report, pursuant to the Court’s January 2, 2024 Order (Dkt No. 69):

Defendants' Discovery Requests to GRI:

1. On January 26, 2024, Defendants' counsel sent a letter to GRI describing what Defendants contend were unresolved deficiency concerns in GRI's supplemental productions, dated December 13, 2023 and December 22, 2023, and followed up via phone the week of February 19, 2024.

2. GRI is preparing a supplemental production and intends to produce these additional documents during the week of February 26, 2024 or early in the week of March 4, 2024. GRI contends that the forthcoming production will resolve any outstanding deficiency concerns raised by Defendants' letter.

3. To evaluate GRI's discovery responses and determine next steps, including scheduling depositions, Defendants' counsel needs to review GRI's forthcoming supplemental production. Because Defendants have not received this supplemental production as of the date of this Report, Defendants' counsel do not believe there are any issues with GRI's discovery responses that require Court intervention at this time.

4. In addition, on February 12, 2024, Defendants served a Notice of Rule 30(b)(6) deposition upon GRI, to which GRI has not yet responded. Defendants intend to proceed with a corporate deposition pending the resolution of the written discovery matters referenced above.

GRI's Discovery Requests to Defendants:

5. On February 8, 2024, Defendant Rorvig made a second supplemental production. GRI has reviewed this production and is in the process of providing its assessment of additional deficiency concerns to Defendant Rorvig.

6. On February 23, 2024, Defendant Nations made a second supplemental production.

7. To evaluate Defendants' discovery responses and determine next steps, including scheduling depositions, GRI's counsel needs to review Defendant Nations' supplemental production.

Parties' Proposed Close of Fact Discovery:

8. Discovery that remains includes (a) the completion of document productions; (b) addressing any remaining concerns that the parties have with each other's discovery; and (c) oral discovery. The parties expect that expert discovery will follow fact discovery.

9. The Parties agree that based on the status of discovery – and depending on the resolution of the written discovery matters addressed above – the current fact discovery deadline

of May 29, 2024 is reasonable and will allow the parties to thoroughly conduct the remaining discovery and address any remaining issues.

10. The parties are currently meeting and conferring regarding deposition schedules.

The Parties anticipate, however, that depositions will occur in late March, April and May 2024.

11. At this time, there are no discovery disputes that require the Court's attention.

Dated: February 27, 2024

Respectfully submitted,

/s/ J. Scott Humphrey

J. Scott Humphrey
Katie M. Burnett
**BENESCH, FRIEDLANDER, COPLAN &
ARONOFF LLP**
71 South Wacker Drive
Suite 1600
Chicago, IL 60606-4637
Telephone: 312-212-4940
shumphrey@beneschlaw.com
kburnett@beneschlaw.com

Counsel for Guaranteed Rate, Inc.

By: /s/ Gregory P. Abrams

Gregory P. Abrams
gregory.abrams@tuckerellis.com
Connor J. Doughty
connor.doughty@tuckerellis.com
TUCKER ELLIS LLP
233 South Wacker Drive, Suite. 6950
Chicago, IL 60606
T: (312) 256-9444

*Counsel for Defendant Eirik Rorvig and
Nations Lending Corporation*

CERTIFICATE OF SERVICE

The undersigned certifies that on February 27, 2024, he served a copy of the foregoing on all counsel of record via electronic case filing procedures.

/s/ J. Scott Humphrey

One of the Attorneys for Plaintiff